

Chapter 1. Purpose and Need for the Proposed Action

1.1 Introduction

The Pacific Ocean and its rich marine living resources are of great environmental, economic, aesthetic, recreational, educational, scientific, nutritional, social and historic importance to the people of California. Market squid (*Loligo opalescens*) is the state's largest commercial fishery by volume. In addition the market squid resource is important to the recreational fishery and is forage for other fish taken for commercial and recreational purposes, as well as for marine mammals, seabirds, and other marine life. The growing international market for squid and declining squid production from other parts of the world has resulted in an increased demand for California market squid, which, in turn, has led to newer, larger, and more efficient vessels entering the fishery and increased processing capacity. The recent expansion in the fishery, combined with record harvests of market squid, has the potential to overfish the market squid resource. Should this occur, it could impact the resource and financially affect those engaged in the taking, landing, processing, and sale of market squid. To prevent excessive fishing effort in the market squid fishery, and to develop a plan for the sustainable harvest of market squid, it is proposed to adopt and implement a fishery management plan for the California market squid fishery that sustains both the squid population and the marine life that depends on squid.

The 1998 Marine Life Management Act (MLMA) enacted Fish and Game Code (FGC) §7050-7090 and became effective in January 1999. The MLMA created state policies, goals, and objectives to govern the conservation, sustainable use and restoration of California's marine living resources. The MLMA also provides guidance for the development of Fishery Management Plans (FMPs) which will form the primary basis for the management and development of regulations for the State's sport and commercial marine fisheries.

The Market Squid Fishery management Plan (MSFMP) fulfills the requirements of the MLMA that the California Department of Fish and Game (Department), on behalf of the Fish and Game Commission (Commission), develop an FMP for the market squid fishery. The specific goals of the MSFMP are listed below:

- To manage the market squid resource for the optimum long-term benefits of present and future generations of Californians.
- To bring the management of this valuable species under one authority.
- To develop a framework for management that will be responsive to environmental and socioeconomic changes.

This Environmental Document (ED) is intended to fulfill the Commission's obligation to comply with the California Environmental Quality Act (CEQA) [Public Resources Code (PRC) §21000 et seq.] in considering and adopting an FMP, and associated implementing regulations. In general, public agencies in California must comply with CEQA whenever they propose to approve or carry out a discretionary project that may have a potentially significant adverse impact on the environment. Where approval of such a project may result in such an impact, CEQA generally requires the lead public agency to prepare an Environmental Impact Report (EIR). In contrast, where no potentially significant impacts could result with project approval, a lead agency may prepare what is commonly known as a negative declaration. Where

an EIR is required, however, the document must identify all reasonably foreseeable, potentially significant, adverse environmental impacts that may result from approval of the proposed project, as well as potentially feasible mitigation measures and alternatives to reduce or avoid such impacts. Because the lead agency must also subject the EIR to public review and comment, and because the agency must respond in writing to any public comments raising significant environmental issues, compliance with CEQA serves to protect the environment and to foster informed public decision-making.

CEQA also provides an alternative to preparation of an EIR or negative declaration in limited circumstances. Under CEQA, the Secretary of Resources is authorized to certify that a state regulatory program meeting certain environmental standards provides a functionally equivalent environmental review to that required by CEQA [PRC §21080.5; see also CEQA Guidelines, §15250-15253; the CEQA Guidelines are found in California Code of Regulations (CCR) Title 14 commencing with §15000]. As noted by the California Supreme Court, “[c]ertain state agencies, operating under their own regulatory programs, generate a plan or other environmental review document that serves as the functional equivalent of an EIR. Because the plan or document is generally narrower in scope than an EIR, environmental review can be completed more expeditiously. To qualify, the agency’s regulatory program must be certified by the Secretary of the Resources Agency. An agency operating pursuant to a certified regulatory program must comply with all of CEQA’s other requirements” [Mountain Lion Foundation v. Fish and Game Comm. (1997) 16 Cal.4th 105, 113-114 (internal citations omitted)].

The Commission’s CEQA compliance with respect to the MSFMP and associated regulations is governed by a certified regulatory program [CEQA Guidelines, §15251, subd. (b)]. The specific requirements of the program are set forth in CCR Title 14 in the section governing the Commission’s adoption of new or amended regulations, as recommended by the Department (CCR Title 14, §781.5). Pursuant to §781.5, this ED contains and addresses the proposed MSFMP and associated implementing regulations, reasonable alternatives to the proposed MSFMP. In so doing, the ED is intended to serve as the functional equivalent of an EIR under CEQA. As noted above, however, preparation of the ED is not a “blanket exemption” from all of CEQA’s requirements [Environmental Protection Information Center v. Johnson (1985) 170 Cal.App.3d 604, 616-618; see also Wildlife Alive v. Chickering (1976) 18 Cal.3d 190]. Instead, the Commission must adhere to and comply with the requirements of its certified program, as well as “those provisions of CEQA from which it has not been specifically exempted by the Legislature” [Sierra Club v. State Board of Forestry (1994) 7 Cal.4th 1215, 1228].

1.2 Location and General Characteristics of the Project Area

The shoreline of California is one of the longest in the nation. There are approximately 1,072 miles of wave washed shoreline along the mainland coast, and 300 miles around the offshore islands. The harvest of market squid is proposed statewide, in all areas defined as ocean waters (CCR Title 14 §27.00), except where prohibited or restricted, as specified, in state refuges, reserves or national parks, and as regulated by provision of this proposed MSFMP. There are two major fishery areas in California divided at Point Conception (Figure 1). The northern fishery is centered in Monterey

Bay and utilizes the ports of Monterey and Moss Landing. The southern fishery is centered in Santa Barbara, Ventura and Los Angeles counties and utilizes the ports of Ventura and Port Hueneme as well as San Pedro and Terminal Island ports within Los Angeles Harbor. While the northern fishery operates predominately within a half-mile of the Monterey Bay shoreline, the southern fishery targets a multitude of fishing spots including the Channel Islands and the coastal areas from Point Conception south to La Jolla.

Market squid have a wide distribution throughout the California Current System from the southern tip of Baja California, Mexico (23° N Latitude) to southeastern Alaska (55° N Latitude, Dickerson and Leos 1992). Although the major fisheries are in central and southern California, short-term fisheries have developed along the coast from central California to British Columbia and southeast Alaska (CDFG 2001). Market squid are pelagic invertebrates and have been found at depths to 2,600 feet. Squid are commercially harvested during spawning at depths of 50 to 150 feet. Commercial fishermen target spawning aggregations of squid; spawning grounds are typically nearshore areas over sandy bottom habitat where egg cases are deposited. An in-depth description of the habitat preferences and life history characteristics of market squid is found in Section 1, Chapter 2 of the MSFMP.

1.3 Scope of the Environmental Document

1.3.1 Proposed Action

For purposes of CEQA and this ED, the proposed action consists of the adoption of the MSFMP and its associated implementing regulations that govern market squid fishing activities in California. The proposed action is intended to be consistent with the Coastal Pelagic Species Fishery Management Plan (CPSFMP) prepared by the Pacific Fishery Management Council (PFMC). In order to prevent excessive fishing effort in the market squid fishery and to develop a plan for the sustainable harvest of market squid, it is necessary to adopt and implement a fishery management plan for the California market squid fishery that sustains both the squid population and the marine life that depends on squid. The various management tools and alternatives available will be described including the stated policies, goals, and objectives of FMPs under the MLMA. The MSFMP will continue to be managed through ongoing oversight and management of the fishery by the Commission.

1.3.2 California Environmental Quality Act (CEQA)

The Legislature enacted CEQA in 1970 to serve primarily as a means to require public agency decision makers to document and consider the environmental implications of their actions. In so doing, CEQA encompasses a number of Legislative findings and declarations, including a finding that it is “necessary to provide a high quality environment that at all times is healthful and pleasing to the senses and intellect of man” [PRC §21000 (b)]. CEQA also codifies state policy to, among other things, “prevent the elimination of fish or wildlife species due to man’s activities, insure that fish and wildlife populations do not drop below self perpetuating levels, and preserve for future generations representations of all plant and animal communities and examples of the major periods of California history” [PRC §21001 (c)]. A similar provision in the FGC also declares: “It is hereby declared to be the policy of the State to encourage the

conservation, maintenance, and utilization of the living resources of the ocean and other waters under the jurisdiction and influence of the State for the benefit of all the citizens of the State and to promote the development of local fisheries and distant-water fisheries based in California in harmony with international law respecting fishing and the conservation of the living resources of the oceans and other waters under the jurisdiction and influence of the State” (FGC §1700).

CEQA applies to all “governmental agencies at all levels” in California, including “state agencies, boards, and commissions” [PRC §21000 (g), 21001 (f) (g)]. Public agencies, in turn, must comply with CEQA whenever they propose to approve or carry out a discretionary project that may have a significant effect on the environment (PRC §21080). For purposes of CEQA, a project includes “an activity which may cause either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment,” that is, like the proposed project, “directly undertaken by any public agency” [PRC §21065 (a)]. Moreover, as mandated by the Legislature, “it is the policy of the State that projects to be carried out by public agencies be subject to the same level of review and consideration under [CEQA] as that of projects required to be approved by public agencies” (PRC §21001.1).

Unlike its “procedural” federal counterpart, the National Environmental Policy Act (42 U.S.C. §4321), CEQA contains a “substantive mandate” that public agencies refrain from approving projects with significant environmental effects if there are feasible mitigation measures or alternatives that can substantially lessen or avoid those effects (Mountain Lion Foundation, *supra*, 16 Cal.4th at p. 134; PRC Section 21002). CEQA, as a result, “compels government first to identify the [significant] environmental effects of projects, and then to mitigate those adverse effects through the imposition of feasible mitigation measures or through the selection of feasible alternatives” [Sierra Club v. State Board of Forestry (1994) 7 Cal.4th 1215, 1233; see also Sierra Club v. Gilroy City Council (1990) 222 Cal.App.3d 30, 41]. Public agencies fulfill CEQA’s mandate through required consultation with other interested public agencies and the public; preparation of EIRs, functional equivalent documents, or other appropriate CEQA analysis; subjecting their environmental analyses to public review and comment, and preparing responses to public comments concerning the environmental impacts associated with their proposed projects; and ultimately adopting findings detailing compliance with CEQA’s substantive mandate. In this respect, the CEQA process “protects not only the environment but also informed self-government” [Citizens of Goleta Valley v. Board of Supervisors (1990) 52 Cal.3d 553, 564 (internal quotation marks deleted)]. Indeed, as recently underscored by the California Supreme Court, compliance with these requirements, even in the context of a certified regulatory program, “ensures that members of the [governmental decision making body] will fully consider the information necessary to render decisions that intelligently take into account the environmental consequences. It also promotes the policy of citizen input underlying CEQA” [Mountain Lion Foundation, *supra*, 16 Cal.4th at p. 133 (internal citations omitted)].

1.3.3 Scoping Process

The MLMA calls for meaningful constituent involvement in the development of each FMP, and requires the Department to develop a process to involve interested parties in that process. In addition, CEQA requires public consultation during lead agency review of all proposed projects subject to a certified regulatory program [See

PRC §21080.5 (d)(2); see also CCR Title 14 §781.5). The adoption of the MSFMP and its associated implementing regulations is such a project under CEQA. In addition to the requirements of the MLMA, CEQA requires public consultation on all environmental projects. The Department accomplishes this through a public comment period, scoping sessions within the communities involved, or at least two Commission meetings. The Department conducted two public meetings to present options for management of the market squid fishery on 26 January 2001 in Port Hueneme and the second was in Monterey on 27 January 2001. The proposed project for management of the market squid fishery was developed through these venues.

In 1998, pursuant to FGC Code Section 8426, the Squid Fishery Advisory Committee (SFAC) and the Squid Research and Scientific Committee (SRSC) were formed to examine the market squid fishery. The SFAC is composed of fishery participants and environmentalists. The SFAC made suggestions to the Department on proposed management strategies for the fishery. The SRSC is composed of domestic and international university, agency, and private industry scientists. The SRSC made recommendations on squid research protocols and methods as well as management. These two committees met from 1998 through 2000 and both have played a large advisory role in interim management of the fishery.

In December 2001, the Department prepared and filed a Notice of Preparation (NOP) with the State Clearinghouse for distribution to appropriate responsible and trustee agencies for their input and comments. Further, the notice was provided to individuals and organizations that had expressed prior interest in regulatory actions regarding market squid.

1.3.4 Public Review and Certification of the Environmental Document

The Commission's certified regulatory program and CEQA itself require that the Draft ED be made available for public review and comment (CCR Title 14 §781.5(f); PRC §21091). Consistent with these requirements, and upon the filing with the Commission of the MSFMP and implementing regulations proposed by the Department, as well as the filing of the same documents with the State Clearinghouse at the governor's Office of Planning and Research, the Draft ED will be made available for public review and comment for no less than 45 days. During this review period, the public is encouraged to provide written comments regarding the Draft ED to the Department at the following address:

Department of Fish and Game
8604 La Jolla Shores Drive
La Jolla, CA 92037
Attention: Dale Sweetnam, Supervising Senior Marine Biologist

Additionally, oral testimony regarding the proposed Draft MSFMP and Draft ED will be accepted by the Commission at the public meetings announced under a separate cover. Public notice of the Commission meetings will be provided. The Department is required by law to prepare written responses to all comments on the Draft ED and proposed MSFMP received during the public review period that raise significant environmental issues. (CCR Title 14 §781.5(h); see also PRC §21092.5.). In some instances, written responses to comments may require or take the form of revisions to the Draft ED or the

proposed MSFMP, or both. Any such revisions, along with the Department's written responses to comments raising significant environmental issues shall constitute the Final ED. The Commission will consider the proposed MSFMP and the ED at a public hearing scheduled to be held in San Diego on 06-07 November 2003. The MSFMP is to go to notice on at the 02-03 August 2003 Commission meeting in Long Beach and public comment is expected at that time. A special hearing will be held in Monterey in mid-September as the second comment period. Comments on the ED will be accepted until September 30. Adoption is expected at the San Diego meeting on 06-07 November 2003. Public notice of the Commission meeting will be provided as required by CEQA and the FGC. Notice of any final decision by the Commission regarding the Final ED and MSFMP will be provided to the extent required by law

1.4 Consultation and Coordination

Because of concern about interactions between the squid fishery and nesting seabirds, including the California brown pelican, a federally and state listed species, the Department coordinated efforts to meet with the other agencies. Agencies involved in the meetings regarding the squid fishery and seabirds included the US Fish and Wildlife Service, Channel Islands National Park Service, Channel Islands National Marine Sanctuary, and NOAA Fisheries personnel. A meeting was held prior to the 4 February 2000 Commission meeting when shielding and wattage regulations were adopted for the squid fishery. An additional meeting took place on 11 October 2000.

1.5 Laws and Regulations

The California constitution gives authority to the State Legislature which may, by statute, provide for the seasons and conditions under which different species of fish may be taken. California law consists of 29 codes including the FGC. Laws in the FGC consist of statutes (chaptered bills that have passed through both houses of the Legislature and ultimately signed by the Governor and recorded by the Secretary of State) and propositions passed by the voters of the State. The FGC is administered and enforced through regulations. The Commission was created by the State constitution. The rulemaking powers of the Commission are delegated to it by the Legislature.

The authority and responsibility of the Commission and the Department to make and enforce regulations governing recreational and commercial fishing is provided by the Legislature and, thereby, the Department is the State agency charged with carrying out policies adopted by the Legislature and Commission. The Department enforces statutes and regulations governing recreational and commercial fishing activities, conducts biological research, monitors fisheries, and collects fishery statistics necessary to protect, conserve, and manage the living marine resources of California. General policies for the conduct of the Department are formulated by the Commission.

Recreational fishing regulations are adopted by the Commission following procedures listed in the FGC. General provisions applying to the taking and possession of fish by recreational fishermen are provided in FGC §7100-7400. Specific sportfishing regulations are found in CCR Title 14, Chapter 4.

Commercial fishing regulations are created by the Legislature and the Commission. Provisions relating to the taking and possession of fish for commercial purposes is provided in FGC §7600-9101 and CCR Title 14, Chapter 6. With the

passage of the MLMA, the Commission has been granted additional broad authority to regulate commercial fisheries.

1.5.1 Marine Life Management Act

It is the policy of the State of California to ensure the conservation, sustainable use, and, where feasible, restoration of California's marine living nearshore resources for the benefit of all the citizens of the State. Programs for the conservation and management of marine fisheries resources shall be established and administered to rebuild depressed stocks, to ensure conservation, to facilitate long-term protection, and, where feasible, restore marine fishery habitats. In addition, whenever feasible and practicable, it is the policy of the State to ensure sustainable commercial and recreational nearshore fisheries, to protect recreational opportunities, and to ensure long-term employment in commercial and recreational fisheries.

The MLMA was signed into law and incorporated into the FGC (§7050-7090) in January 1998. The Act created State policies, goals, and objectives to govern the conservation, sustainable use and restoration of California's marine living resources. The MLMA provides guidance to management of the State's living marine resources, in general, and of its fisheries. The general policy on all marine resources is to ensure conservation, sustainable use, and restoration of those resources. Sustainability is to be achieved by allowing only activities and uses that are themselves sustainable. The policy on fisheries management for both recreational and commercial fisheries is meant to maintain the long-term economic, recreational, cultural, and social values of the fisheries and their habitats.

1.5.2 Federal Laws

In addition, marine resources also are managed by federal laws governing the take of seabirds, marine mammals, fish, and shellfish. The federal government manages the marine resources and fishing activities of the United States through the Magnuson-Stevens Fishery Conservation and Management Act of 1976 and the Sustainable Fisheries Act of 1996 (now called the Magnuson-Stevens Fishery Conservation and Management Act [MSFCMA]). The purpose of the MSFCMA is to provide conservation and management of US fishery resources, develop domestic fisheries, and phase out foreign fishing activity within the Exclusive Economic Zone (EEZ) consisting of ocean waters from the edge of state waters (3 miles) to 200 miles offshore.

Eight Regional Fishery Management Councils implement the goals of the MSFCMA through regulations adopted by NOAA Fisheries. The PFMC manages the federal fisheries resources off Washington, Oregon, and California by developing fishery management plans for the EEZ. The PFMC manages five coastal pelagic species (CPS) species including market squid, northern anchovy, Pacific sardine, jack mackerel and Pacific mackerel under the CPSFMP. The State of California sits on the PFMC. When NOAA Fisheries adopts regulations for CPS included in the CPSFMP, conforming regulations need to be adopted by the Commission to avoid federal preemption under the MSFCMA (16 U.S.C. Section 856(b)), to facilitate coordination and execution of resource management activities, to increase the efficiency and effectiveness of state law enforcement, and to remain consistent with the Legislature's intent that federal-state fisheries management conformity is desirable (FGC §7652.)

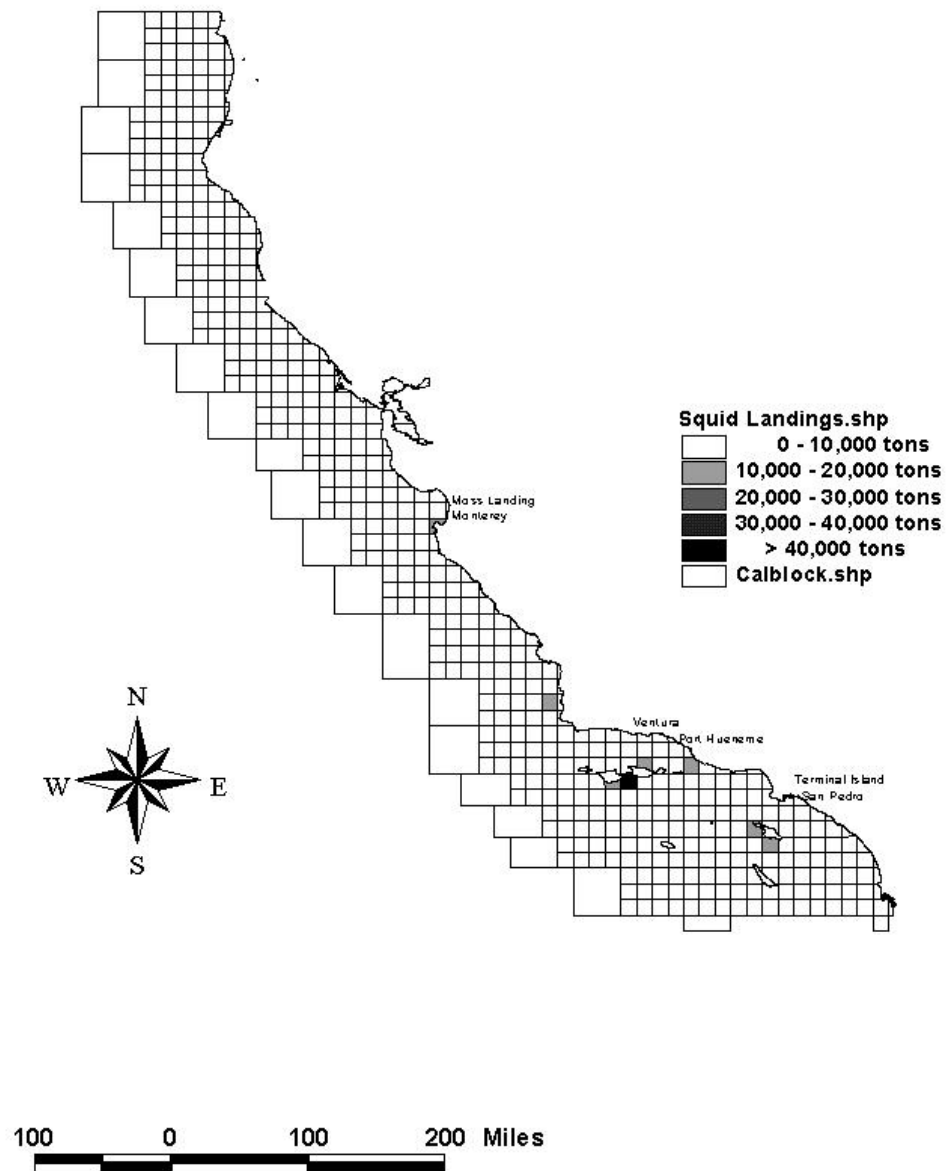


Figure 1-1. Location of Landings in the Market Squid Fishery

Chapter 2. Project Description and Alternatives

Project Options Analyzed in the Environmental Document

An ED need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. It is not required to consider alternatives which are infeasible. The discussion of alternatives focuses on alternatives to the project which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly. Of those alternatives, this document examines in detail only the ones that could feasibly attain most of the basic objectives of the project. This document provides information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project and does not consider alternatives whose effect cannot be reasonably ascertained and whose implementation is remote and speculative. The following provides a range of alternatives to the proposed project, that could feasibly accomplish most of the basic objectives of the project and avoid or substantially lessen one or more of the project-related effects. Project alternatives were developed from various sources including the two advisory groups and input from public meetings. Chapter 1 Section 1 describes the development of the alternatives in detail.

Section 1 of the MSFMP describes 17 option categories for management of the market squid fishery based on four components; fishery control rules, squid harvest replenishment areas, restricted access, and other concerns (Table 2-1). Some of the management option categories, such as the permit fees, monitoring the fishery using egg escapement, port sampling and logbook analyses, and establishment of an advisory committee, do not have any adverse environmental impacts, thus, they are not discussed any further. This chapter describes the 12 remaining option categories associated with the proposed project, the no project alternative (status-quo), and other project alternatives that have a potential to affect the environment. The 12 option categories have two to five options which, when combined with other options categories, will comprise either the proposed project, the no project alternative (status-quo), or other project alternatives. These different options are available to the Commission to manage the market squid fishery. Whether implementation of the MSFMP will result in potentially significant impacts under CEQA is a function of whether implementation of the individual option would cause such impacts. Option designations (letter and number) have been retained in this chapter to reference Section 1 of the MSFMP. A detailed description of the components and the rationale for the options can be found in Section 1, Chapter 3 of the MSFMP.

In Section 1 of the MSFMP, some status quo options also are the proposed project option (e.g. C2, D1, E1, F1, G1, O1). Some of these options are currently regulations, and were put in place until a fishery management plan for market squid could be developed and implementing regulations adopted, at which time certain code sections relating to the squid fishery also become inoperative. Because the Department recommends continuing these existing market squid regulations while adding new restrictions to the fishery, they are part of the MSFMPs proposed or preferred project. However, for purposes of this analysis, the proposed project only consists of the preferred options that are not status quo. For CEQA analyses, the status quo

alternative is considered the “no project” alternative as since that represents the “pre-project” baseline environmental conditions. The purpose of analyzing the no project alternative is to allow a comparison of the impacts of approving the proposed project versus the impacts of not approving the proposed project. CEQA Guidelines (CCR Title 14, §15126), require that this document must provide an accurate description of the current environmental conditions (affected environment) and identify any impacts that currently exist with the no project alternative. Furthermore, it must describe the type of impacts, level of impact, as well as potentially feasible mitigation measures and alternatives to reduce or avoid such impacts, that would occur with the proposed project and alternatives. Tables 2-2 to 2-4 summarize the components and options discussed in this document under the proposed project, the no project alternative and other project alternative options.

TABLE 2-1 COMPONENTS AND OPTIONS ANALYZED IN THE ED		
Component	Letter	Option Category
Fishery Control Rules	A	Seasonal statewide catch limitation
	C	Daily trip limits
	D	Weekend closures
	F	Live bait fishery and incidental catch
Squid Harvest Replenishment Areas	G	
Restricted Access	H	Limited entry and capacity goals
	I	Initial issuance of market squid fleet permits
	K	Transferability of permits for market squid vessels
	L	Transferability of permits for market squid brail vessels
	M	Transferability of permits for market light boats
Other Concerns	O	Lighting gear restrictions
	P	Area closures for seabird protection

TABLE 2-2 PROPOSED PROJECT OPTIONS	
	Fishery Control Rules
A2	Statewide seasonal catch of 118,000 tons
	Restricted Access
H3	Capacity goal for vessels & light boats at 52 permits each, 18 brail permits would be light boats
I1	Meet specifications for issuance of squid fleet permits (squid vessel, squid brail, squid light boat)
K3	Transfer vessel permits based on comparable capacity under a “2 for 1” retirement and secure 2 permits to enter the fishery
L3	Establish full permit transferability of market squid brail permits based on comparable capacity
M3	Establish full permit transferability for light boats with a “2 for 1” retirement
M4	Trade either 2, 3 or 4 light boat permits for one brail permit
	Other Concerns
P4	Establish areas closed to squid vessels using attracting lights; 1 nm closure at Anacapa and Santa Barbara islands from 1 February to 30 September

TABLE 2-3 NO PROJECT ALTERNATIVE (STATUS QUO) OPTIONS	
	Fishery Control Rules
A5	Statewide seasonal catch of 125,000 tons
C2	No daily trip limits
D1	Weekend closures from noon Friday to noon Sunday
F1	No squid permit for live bait or landing 2 tons/day
	Squid Harvest Replenishment Areas
G1	No specific areas set aside as squid harvest replenishment areas
	Restricted Access
H5	No capacity goal (no limited entry program)
I2	184 squid vessel and 41 light boat permits, no additional brail permits
K1	No permit transfers for squid vessels except in major breakdown or loss of vessel
L1	No permit transfers for brail vessels except in major breakdown or loss of vessel
M1	No permit transfers for light boats except in major breakdown or loss of vessel
	Other Concerns
O1	Gear options; maintain shields and light wattage regulations
P5	No seabird time and area closures

TABLE 2-4 ALTERNATIVE OPTIONS	
	Fishery Control Rules
A1	Statewide seasonal catch limit of 80,000 tons
A3	Regional seasonal catch limit based on multi-year averages
A4	Statewide seasonal catch limit based on environmental conditions
A6	No seasonal catch limitation*
C1	Establish daily trip limit between 30-137.8 tons for vessels and 15 tons for brails
D2	Do not continue weekend closures*
F2	Establish a permit for the taking of squid for live bait
	Squid Harvest Replenishment Areas
G2	Close all waters within depths of 100 fa around San Nicholas Island
	Restricted Access
H1	Capacity goal for vessels and light boats at 10 permits each and 18 brail permits
H2	Capacity goal for vessels and light boats at 52 permits each and 18 brail permits
H4	Capacity goal for vessels and light boats at 104 permits each and 18 brail permits
I3	Issue purchase by any permit-holder in first year of moratorium
I4	Meet specifications for issuance of squid fleet permits (version 2)
I5	Do not have a permit program*
K2	Establish full permit transferability of market squid vessels
L2	Full transferability of brail permits assuming 15-ton daily trip limit (C1) is adopted
M2	Establish full permit transferability of market squid light boat permits
	Other Concerns
O2	Remove existing gear options regarding shields and light wattage*
P1	Establish areas closed to squid fishing; 1 nm closure at San Miguel, Anacapa, and Santa Barbara islands, from 1 February to 30 September
P2	Establish areas closed to squid fishing; 1 nm closure at Anacapa and Santa Barbara islands from 1 February to 30 September
P3	Establish areas closed to squid vessels using attracting lights; 1 nm closure at San Miguel, Anacapa, and Santa Barbara islands, from 1 February to 30 September

* Not discussed in detail in the ED, refer to Section 5.2